

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

LIGADO NETWORKS LLC, *et al.*,¹

Debtors.

)
) Chapter 11
)

) Case No. 25-10006 (TMH)
)

) (Jointly Administered)
)
)
)

**DECLARATION OF
JERIAD R. PAUL REGARDING THE SOLICITATION
AND TABULATION OF VOTES ON, AND ELECTIONS
TO OPT OUT OF THE THIRD PARTY RELEASE CONTAINED
IN, THE JOINT CHAPTER 11 PLAN OF LIGADO NETWORKS LLC
AND ITS AFFILIATED DEBTORS AND DEBTORS IN POSSESSION**

I, Jeriad R. Paul, pursuant to 28 U.S.C. § 1746, hereby declare that the following is true and correct to the best of my knowledge, information, and belief:

1. I am the Vice President of Omni Agent Solutions, Inc. (“Omni”), a chapter 11 administrative services firm, whose offices are located at 5955 De Soto Ave., Suite 100, Woodland Hills, California, 91367 and 1120 Avenue of the Americas, 4th Floor, New York, NY 11036. I am over the age of 18 years and not a party to the above-captioned action.

2. I submit this declaration (the “Declaration”) with respect to (i) the solicitation of votes and tabulation of Ballots (as defined below) cast on the *Joint Chapter 11 Plan of Ligado Networks LLC and its Affiliated Debtors and Debtors in Possession* [Docket No. 696] (as may be

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Ligado Networks LLC (3801); ATC Technologies, LLC (N/A); Ligado Networks (Canada) Inc. (N/A); Ligado Networks Build LLC (N/A); Ligado Networks Corp. (N/A); Ligado Networks Finance LLC (N/A); Ligado Networks Holdings (Canada) Inc. (N/A); Ligado Networks Inc. of Virginia (9725); Ligado Networks Subsidiary LLC (N/A); One Dot Six LLC (8763); and One Dot Six TVCC LLC (N/A). The Debtors’ headquarters is located at: 10802 Parkridge Boulevard, Reston, Virginia 20191.

amended, supplemented or otherwise modified from time to time, the “Plan”) and (ii) the solicitation and tabulation of elections to opt-out to the Third-Party Release contained in the Plan.

3. Prior to the commencement of the Chapter 11 Cases, Ligado Networks LLC and the other above-captioned debtors and debtors in possession (collectively, the “Debtors”) engaged Omni as their claims, noticing, and solicitation agent (the “Solicitation Agent”) to assist with, among other things, (a) serving solicitation materials to the parties entitled to vote to accept or reject the Plan and (b) tabulating votes cast with respect thereto. Omni and its employees have considerable experience in soliciting and tabulating votes to accept or reject proposed chapter 11 plans. The Court authorized Omni’s retention (a) as claims and noticing agent to the Debtors on January 7, 2025 pursuant to the *Order (I) Authorizing and Approving the Appointment of Omni Agent Solutions, Inc. as Claims and Noticing Agent; and (II) Granting Related Relief* [Docket No. 97] and (b) as administrative agent to the Debtors on February 20, 2025 pursuant to the *Order Authorizing Employment and Retention of Omni Agent Solutions, Inc. as Administrative Agent Effective as of the Petition Date* [Docket No. 253].

4. Except as otherwise noted, all facts set forth herein are based on my personal knowledge, knowledge that I acquired from individuals under my supervision or from the Debtors, and/or my review of the relevant documents. I am authorized to submit this Declaration on behalf of Omni. If I were called to testify, and if called as a witness, I could and would testify competently as to the facts set forth herein.

A. Service and Transmittal of the Solicitation Packages.

5. Pursuant to the Disclosure Statement Order (as defined below), the Debtors established June 20, 2025, as the record date (the “Voting Record Date”) for determining which creditors were entitled to vote on the Plan. Pursuant to the Plan, Holders of Class 3 First Lien

Claims, Class 4 1.5 Lien Claims, Class 5 Second Lien Note Claims, Class 9 Series A-0 Preferred Units, and Class 10 Series A-1 Preferred Units (the “Voting Classes”) as of the Voting Record Date were entitled to vote to accept or reject the Plan. No other classes were entitled to vote on the Plan.

6. On June 26, 2025 Omni caused to be distributed via first-class mail and/or email to Holders of Claims and Interests in the Voting Classes as of the Voting Record Date: (a) the notice of hearing to be held by the Court to consider Confirmation of the Plan (the “Confirmation Hearing Notice”); (b) instructions, including a QR code and URL link, for accessing the Disclosure Statement, the Plan, and the Disclosure Statement Order; (c) an appropriate Class ballot (the “Ballot”); and (d) a pre-paid, pre-addressed return envelope (collectively, the “Solicitation Package”).

7. The Solicitation Packages were distributed in accordance with the solicitation procedures (the “Solicitation Procedures”) described in the *Order (I) Approving Proposed Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing, (II) Establishing Solicitation and Voting Procedures, (III) Scheduling Confirmation Hearing, (IV) Establishing Notice and Objection Procedures for Confirmation of Proposed Plan, and (V) Granting Related Relief* [Docket No. 694] (the “Disclosure Statement Order”).²

8. In accordance with the Solicitation Procedures, Omni worked closely with the Debtors and their advisors to identify the Holders of Claims and Interests in the Voting Classes as of the Voting Record Date that were entitled to vote on the Plan and to coordinate the distribution of the Solicitation Packages to such Holders of Claims and Interests. A detailed description

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Disclosure Statement Order or the Plan, as applicable.

evidencing the service of the Solicitation Packages is set forth in the *Affidavit of Service*, dated July 9, 2025 [Docket No. 736].

B. The Tabulation Process.

9. In accordance with the Solicitation Procedures, Omni reviewed, determined the validity of and tabulated the Ballots submitted to vote on the Plan. Each Ballot submitted to Omni was processed in accordance with the Solicitation Procedures. To be included in the tabulation results as valid, each Ballot must have been properly executed, completed, and delivered according to the applicable voting instructions by: (a) first class mail; (b) overnight courier; or (c) personal delivery, so that each Ballot was actually received by Omni no later than the July 24, 2025 at 4:00 PM Eastern Time (the “Voting Deadline”) at the return address set forth in the applicable Ballot. Alternatively, Ballots could be submitted electronically through the Solicitation Agent’s E-Ballot Portal at <https://omniagentsolutions.com/Ligado-Ballots> by no later than the Voting Deadline or as permitted by the Court. In addition to the E-Ballot Portal, Nominees could email their Master Ballots to LigadoBallots@OmniAgnt.com. Omni completed its final tabulation of the Ballots on July 28, 2025, following a complete review and audit of all Ballots received.

10. Set forth below is a summary of the voting results with respect to the Voting Class, tabulated on a consolidated basis:

Total Ballots Received			
Accept		Reject	
Number (% of Number)	Amount (% of Amount)	Number (% of Number)	Amount (% of Amount)
Class 3 – First Lien Claims			
236 (99.578%)	\$5,496,239,925.56 (99.996%)	1 (.422%)	\$203,227.00 (0.004%)

Class 4 – 1.5 Lien Claims			
113 (100%)	\$528,406,470.34 (100%)	0 (0%)	\$0.00 (0%)
Class 5 – Second Lien Note Claims			
132 (100%)	\$2,040,981,762.00 (100%)	0 (0%)	\$0.00 (0%)
Class 9 – Series A-0 Preferred Units			
31 (100%)	\$19,197,292.25 (100%)	0 (0%)	\$0.00 (0%)
Class 10 – Series A-1 Preferred Units			
14 (100%)	\$13,359,803.04 (100%)	0 (0%)	\$0.00 (0%)

11. The final tabulation of votes cast by timely and properly completed Ballots received by Omni is attached hereto as **Exhibit A**.

C. Ballot Opt-Out Election.

12. In addition, in accordance with the Solicitation Procedures, Omni reviewed and tabulated the elections recorded on the Ballots from Holders of Claims and Interests in the Voting Classes to opt-out to the Plan’s Third-Party Release. Omni received no Opt-Out elections from Voting parties.

D. Ballots that Contained Irregularities or Were Not Counted.

13. There were no valid ballots excluded from the voting tabulation.

E. Notices of Non-Voting Status and Opt-Out Forms.

14. On June 26, 2025, Omni sent via first-class mail and/or email (a) the notice of hearing to be held by the Court to consider Confirmation of the Plan (the “Confirmation Hearing Notice”); (b) instructions, including a QR code and URL link, for accessing the Disclosure

Statement, the Plan, and the Disclosure Statement Order; (c) the Notice of Non-Voting Status and Opt-Out Form to Holders of Claims and Interests in the Non-Voting Classes.

15. All valid opt-out forms cast by Holders of Claims and Interests in the Non-Voting Classes received by Omni on or before the Voting Record Date were tabulated pursuant to the procedures set forth in the Disclosure Statement Order. Omni received two Opt-Out Forms from parties to whom Non-Voting Opt-Out Forms were sent. Omni's tabulation of such valid opt-out forms is set forth in the report annexed hereto as **Exhibit B**.

16. Omni is in possession of the valid Ballots and opt-out forms, and copies of the same are available for review and inspection by or submission to this Court.

To the best of my knowledge, information, and belief, the foregoing information concerning the distribution, submission, and tabulation of Ballots and opt-out forms in connection with the Plan is true and correct.

Dated: August 28, 2025

/s/ Jeriad R. Paul

Jeriad R. Paul

Vice President

Omni Agent Solutions, Inc.